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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAR 19 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

2:24-CR-42-TOR

12 Plaintiff,

INDICTMENT

13 v.

Vio: 18 U.S.C. § 1343

14 LUKE MICHAEL SERVAS

Wire Fraud
(Counts 1-25)

15 Defendant.

18 U.S.C. § 1344(1) and (2)
Bank Fraud
(Counts 26-51)

18 U.S.C. § 1028A(a)(1)
Aggravated Identity Theft
(Counts 52-76)

18 U.S.C. § 981, 18 U.S.C.
§ 982, 18 U.S.C. § 1028, 28
U.S.C. § 2461(c)
Forfeiture Allegations

25 The Grand Jury Charges:

26 INTRODUCTION

27 1. Between October 2022 and March 2023, Defendant LUKE
28 MICHAEL SERVAS, while employed and appointed as the Town Clerk for the

1 Town of Cusick, an incorporated municipality in the Eastern District of
2 Washington, used his public position of trust to fraudulently obtain, embezzle, and
3 convert to his own use more than \$195,000 in Town of Cusick public funds.

4 2. Defendant LUKE MICHAEL SERVAS attempted to conceal his
5 conduct and avoid detection by transferring most of the embezzled funds using the
6 mayor's Town of Cusick credit card, and by engaging in other false and fraudulent
7 representations, statements, and promises. When funds were discovered missing,
8 Defendant then made a false and fraudulent complaint to law enforcement to
9 attempt to cast suspicion on others and conceal his own fraudulent conduct.

10 GENERAL BACKGROUND

11 At all times relevant to this Indictment:

12 3. Cusick is a small municipality located in Pend Oreille County in the
13 Eastern District of Washington.

14 4. To ensure issues impacting the operation and maintenance of Cusick
15 are effectively managed, Cusick elects a town council comprised of members
16 considered to be trustworthy by the community. Like many municipalities, Cusick
17 appoints a town councilmember or other trusted individual as the town clerk.
18 Cusick's town clerk is obligated to keep true and accurate records of city council
19 accounts and proceedings, and to generate reports as required by the state auditor
20 under state law.

21 5. Throughout all time periods relevant to the Indictment, Cusick's town
22 council managed and maintained a Town of Cusick operating bank account at
23 Spokane Teachers' Credit Union ("STCU") with account number ending in 9869.
24 STCU is a federally insured financial institution, the deposits of which are insured
25 by the National Credit Union Administration.

26 6. Funds entering Cusick's operating town bank account originate from
27 numerous sources, while the account's outgoing expenses relate to town
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1 maintenance, necessary public services, and other legitimate public expenditures.
2 During the time period relevant to the Indictment, two Town of Cusick credit cards
3 issued by STCU were linked to and used Cusick's operating bank account: one in
4 the name of the mayor, and one in the name of the town clerk. Cusick's mayor and
5 town clerk utilize these credit cards for authorized expenses related to their duties
6 in their official capacity as elected and appointed Town of Cusick personnel.

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8 7. The Town of Cusick's operating bank account is managed by the
9 town council; however, the town clerk acts as the account's official custodian. To
10 assist the town clerk in effectively managing the town's financial records and
11 transactions related to Cusick's savings and expenditures, the Cusick town council
12 provides the town clerk with access to Cusick's STCU operating bank account.

13 8. Between October 2022 and March 2023, Defendant LUKE
14 MICHAEL SERVAS served as the town's appointed clerk, responsible for the
15 town's operating bank account, accounting services, and bookkeeping services.

16 9. At all times relevant to the Indictment, Defendant LUKE MICHAEL
17 SERVAS had access to the Town of Cusick's operating bank account, town credit
18 cards, and other financial accounting records and information. While Defendant
19 LUKE MICHAEL SERVAS had limited purchase authority on behalf of the Town
20 of Cusick relative to his legitimate duties as town clerk as well as his own credit
21 card drawing off of the town's operating account to be used for legitimate public
22 expenses and within his authority, Defendant LUKE MICHAEL SERVAS was not
23 permitted lawful access to the Cusick mayor's credit card, which was issued in the
24 mayor's name and signature for his use alone.

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26 10. At all times relative to the Indictment, Defendant LUKE MICHAEL
27 SERVAS operated a PayPal account entitled LMSERVAS with account number
28 ending in 6878. PayPal is an internet-based peer-to-peer money transfer
application.

1 name of D.S., then the Town of Cusick Mayor, which account was connected to
2 the town's STCU operating account. Defendant LUKE MICHAEL SERVAS
3 obtained access to D.S.'s Town of Cusick STCU credit card by intercepting it in
4 the mail and activating it without D.S.'s authorization. Defendant LUKE
5 MICHAEL SERVAS activated and used D.S.'s Town of Cusick credit card
6 without the knowledge or permission of D.S., and without any legitimate purpose
7 or lawful authority. As a part of the scheme, Defendant LUKE MICHAEL
8 SERVAS then used D.S.'s Town of Cusick credit card to transfer Town of Cusick
9 funds from the Town of Cusick's STCU operating account to accounts that
10 Defendant LUKE MICHAEL SERVAS and his spouse owned and controlled.

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12 16. As a part of the scheme, beginning in October 2022, and continuing
13 until March 2023, Defendant LUKE MICHAEL SERVAS transferred funds from
14 the Town of Cusick operating bank account at STCU with account number ending
15 in 9869 to D.S.'s Town of Cusick STCU credit card account number ending in
16 4518 and to the town clerk credit card account at STCU in Defendant LUKE
17 MICHAEL SERVAS' name with account number ending in 4906.

18 17. As an additional part of the scheme, between on or about October 6,
19 2022, and until at least on or about March 3, 2023, using his access to Cusick's
20 operating bank account, D.S.'s Town of Cusick credit card account, and his own
21 Town of Cusick credit card account, Defendant LUKE MICHAEL SERVAS,
22 without lawful authority, fraudulently caused funds to be electronically transferred
23 from Town of Cusick STCU accounts to his PayPal account with account number
24 ending in 6878 that he owned and controlled, and to his spouse's PayPal account
25 with account number ending in 2018, using interstate wires.

26
27 18. As part of the scheme, on or about December 6, 2022 and December
28 13, 2022, using his access to Cusick's operating bank account and his own Town
of Cusick credit card, Defendant LUKE MICHAEL SERVAS, without authority,

1 and using the interstate wires, fraudulently converted funds from the Town of
2 Cusick accounts to Defendant LUKE MICHAEL SERVAS' Uphold
3 cryptocurrency account with user id ending in 5d8d that he owned and controlled.

4 19. As an additional part of the scheme and in an attempt to conceal it,
5 between on or about October 11, 2022 and on or about March 3, 2023, Defendant
6 LUKE MICHAEL SERVAS transferred funds from the Town of Cusick's
7 operating account through and using D.S.'s Town of Cusick credit card account to
8 Defendant LUKE MICHAEL SERVAS' and his spouse's PayPal accounts.
9 Defendant LUKE MICHAEL SERVAS did so to conceal the fraud and make it
10 appear as though the mayor was the individual responsible for embezzling the
11 funds. Defendant LUKE MICHAEL SERVAS completed these fraudulent
12 transfers via transfers made from the Town of Cusick's operating account to
13 "prepay" D.S.'s Town of Cusick's credit card account, and then subsequently
14 transferring funds using D.S.'s Town of Cusick credit card account to Defendant
15 LUKE MICHAEL SERVAS' and his spouse's PayPal accounts.
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17 20. As an additional part of the scheme, and in an attempt to conceal his
18 fraudulent conduct, on or about March 7, 2023, after other public officials
19 expressed concern that significant funds were missing, Defendant LUKE
20 MICHAEL SERVAS contacted the Pend Oreille County Sheriff's Office
21 (hereinafter "POCSO") to report that between \$150,000 and \$200,000 had been
22 fraudulently stolen from the Town of Cusick's operating bank account. Defendant
23 LUKE MICHAEL SERVAS falsely and fraudulently told POCSO that the money
24 had been stolen using D.S.'s Town of Cusick credit card account and that only
25 D.S., the mayor, had access to the use of that card. Defendant LUKE MICHAEL
26 SERVAS did this to obscure the fraud and mislead law enforcement.
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28 21. As part of the scheme, in total, between on or about October 6, 2022,
and until at least on or about March 3, 2023, Defendant LUKE MICHAEL

1 SERVAS, in the manner described above, fraudulently obtained at least
2 \$190,752.12 from Cusick's STCU operating account with account number ending
3 in 9869, using interstate wires to consummate hundreds of fraudulent transactions
4 for which he had no legal authority or legitimate public purpose, including:

- 5 a. fraudulent transfers from Cusick's STCU operating account
6 ending in 9869 to D.S.'s Town of Cusick credit card account with
7 account number ending in 4518. Between October 6, 2022 and
8 February 27, 2023, Defendant LUKE MICHAEL SERVAS then,
9 without lawful authority or legitimate purpose, used D.S.'s Town
10 of Cusick credit card to make hundreds of transfers to two PayPal
11 accounts, Defendant LUKE MICHAEL SERVAS' spouse's PayPal
12 account ACOMPLEX444 with account number ending in 2018,
13 and Defendant LUKE MICHAEL SERVAS' own account
14 LMSERVAS with account number ending in 6878. In this manner,
15 Defendant LUKE MICHAEL SERVAS fraudulently converted to
16 himself at least \$174,227.00 in Town of Cusick public funds.
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18 b. fraudulent transfers from the Town of Cusick's STCU operating
19 account with account number ending in 9869 transferred to
20 Defendant LUKE MICHAEL SERVAS' own Town of Cusick
21 credit card account at STCU ending in account number 4906.
22 Between December 5, 2022 and December 13, 2022, Defendant
23 LUKE MICHAEL SERVAS then used his own Town of Cusick
24 credit card account ending in 4906 to make purchases to Defendant
25 LUKE MICHAEL SERVAS' PayPal account LMSERVAS with
26 account number ending in 6878. In this manner, Defendant LUKE
27 MICHAEL SERVAS, without legal authority or legitimate public
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1 purpose, fraudulently converted to himself at least \$10,559 in
2 Town of Cusick public funds.

3 c. fraudulent transfers from the Town of Cusick's STCU operating
4 account with account number ending in 9869 transferred to
5 Defendant LUKE MICHAEL SERVAS' own Town of Cusick
6 credit card account ending in account number 4906. Between
7 December 5, 2022 and December 13, 2022, Defendant LUKE
8 MICHAEL SERVAS then used his own Town of Cusick credit
9 card account ending in 4906 to make transfers to Defendant LUKE
10 MICHAEL SERVAS' Uphold cryptocurrency account with user id
11 ending in 5d8d. In this manner, Defendant LUKE MICHAEL
12 SERVAS, without legal authority or legitimate public purpose,
13 fraudulently converted to himself at least \$5,966.12 in Town of
14 Cusick public funds.
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16 22. Additionally, as part of the scheme, on or about March 10, 2023,
17 Defendant LUKE MICHAEL SERVAS, without legal authority or legitimate
18 public purpose, wrote a fraudulent Town of Cusick check for \$4,961.08 to himself
19 drawn on the Town of Cusick's STCU account ending in 9869, dated March 10,
20 2023, and forged D.S.'s signature on the check, as well as the signature of E.A.,
21 then a member of the Cusick Town Council who had check writing authority on
22 behalf of the Town of Cusick. On or about March 20, 2023, Defendant LUKE
23 MICHAEL SERVAS then negotiated the fraudulent and forged check to himself,
24 fraudulently converting to himself the Town of Cusick public funds from the
25 STCU account.
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27 23. These fraudulent transfers and transactions undertaken by Defendant
28 LUKE MICHAEL SERVAS using Town of Cusick funds were not related to any
legitimate public expense of the Town of Cusick. Nor did Defendant LUKE

MICHAEL SERVAS have any legitimate claim or entitlement to these funds. Nor did Defendant LUKE MICHAEL SERVAS transfer these funds relative to any legitimate expense or transaction of the Town of Cusick, or one for which he had permission, proper purpose, or lawful authority. Rather, these transactions were undertaken by Defendant LUKE MICHAEL SERVAS in order to fraudulently and improperly convert Town of Cusick public funds to his own use.

COUNTS 1-25

(Wire Fraud)

24. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 23 as if fully set forth herein. Further, the allegations in all other counts of the Indictment are re-alleged and incorporated into this count as if fully set forth herein.

25. On or about the specific dates set forth below, in the Eastern District of Washington, Defendant LUKE MICHAEL SERVAS, for the purpose of obtaining money from the Town of Cusick, did knowingly and with intent to defraud, transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce the signals and sounds described below for each count, each transmission constituting a separate count:

Count	Date of Wire	Description of Wire
1	On or about October 6, 2022	Fraudulent transfer in the amount of \$257.55 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
2	On or about October 22, 2022	Fraudulent transfer in the amount of \$309.00 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in

		an interstate wire from the State of Washington to the State of Utah.
3	On or about November 2, 2022	Fraudulent transfer in the amount of \$206.10 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
4	On or about November 7, 2022	Fraudulent transfer in the amount of \$206.10 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
5	On or about November 7, 2022	Fraudulent transfer in the amount of \$216.39 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
6	On or about November 12, 2022	Fraudulent transfer in the amount of \$420.13 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
7	On or about November 13, 2022	Fraudulent transfer in the amount of \$422.19 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
8	On or about November 13, 2022	Fraudulent transfer in the amount of \$463.35 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to

		PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
9	On or about November 16, 2022	Fraudulent transfer in the amount of \$247.26 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
10	On or about November 17, 2022	Fraudulent transfer in the amount of \$317.23 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
11	On or about November 18, 2022	Fraudulent transfer in the amount of \$421.16 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018, resulting in an interstate wire from the State of Washington to the State of Utah.
12	On or about November 30, 2022	Fraudulent transfer in the amount of \$309.00 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
13	On or about December 3, 2022	Fraudulent transfer in the amount of \$314.15 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.

1	14	On or about December 4, 2022	Fraudulent transfer in the amount of \$442.77 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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6	15	On or about December 6, 2022	Fraudulent transfer in the amount of \$600.00 using the Defendant's LUKE MICHAEL SERVAS' Town of Cusick credit card account number ending in 4906 to Defendant's Uphold cryptocurrency account with user id ending in 5d8d, resulting in an interstate wire from the State of Washington to the State of Virginia.
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12	16	On or about December 13, 2022	Fraudulent transfer in the amount of \$963.12 using the Defendant's LUKE MICHAEL SERVAS' Town of Cusick credit card account number ending in 4906 to Defendant's Uphold cryptocurrency account with user id ending in 5d8d, resulting in an interstate wire from the State of Washington to the State of Virginia.
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18	17	On or about December 15, 2022	Fraudulent transfer in the amount of \$487.02 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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23	18	On or about December 19, 2022	Fraudulent transfer in the amount of \$487.02 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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28	19	On or about January 1, 2023	Fraudulent transfer in the amount of \$483.93 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to

1			Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
2	20	On or about January 7, 2023	Fraudulent transfer in the amount of \$483.93 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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4	21	On or about January 20, 2023	Fraudulent transfer in the amount of \$489.08 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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6	22	On or about February 2, 2023	Fraudulent transfer in the amount of \$468.50 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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8	23	On or about February 11, 2023	Fraudulent transfer in the amount of \$483.93 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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10	24	On or about February 20, 2023	Fraudulent transfer in the amount of \$494.22 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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25	On or about February 27, 2023	Fraudulent transfer in the amount of \$494.22 using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant's PayPal account LMSERVAS with account number ending in 6878, resulting in an interstate wire from the State of Washington to the State of Utah.
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All in violation of 18 U.S.C. § 1343.

COUNTS 26-51

(Bank Fraud)

26. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 25 as if fully set forth herein. Further, the allegations in all other counts of the Indictment are re-alleged and incorporated into this count as if fully set forth herein.

27. On or about each of the dates below, Defendant LUKE MICHAEL SERVAS, in the Eastern District of Washington, did knowingly, and with intent to defraud, execute, and attempt to execute, and cause the execution of, a scheme and artifice to defraud STCU, a financial institution as defined by 18 U.S.C. § 20, which scheme and artifice employed material falsehoods, and did knowingly, and with intent to defraud, execute, and attempt to execute, and cause the execution of, a scheme and artifice to obtain moneys, funds, credits, assets, or other property owned by, and under the custody and control of STCU by means of false and fraudulent pretenses, representations, and promises, as detailed in the Counts herein, described below for each count, each execution of the scheme and artifice constituting a separate count:

Count	Date	Description of Execution
26	On or about October 6, 2022	Fraudulent transfer in the amount of \$257.55 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518

		to PayPal account ACOMPLEX444 with account number ending in 2018.
27	On or about October 22, 2022	Fraudulent transfer in the amount of \$309.00 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
28	On or about November 2, 2022	Fraudulent transfer in the amount of \$206.10 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
29	On or about November 7, 2022	Fraudulent transfer in the amount of \$206.10 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
30	On or about November 7, 2022	Fraudulent transfer in the amount of \$216.39 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
31	On or about November 12, 2022	Fraudulent transfer in the amount of \$420.13 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
32	On or about November 13, 2022	Fraudulent transfer in the amount of \$422.19 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.

1	33	On or about November 13, 2022	Fraudulent transfer in the amount of \$463.35 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
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5	34	On or about November 16, 2022	Fraudulent transfer in the amount of \$247.26 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
6			
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10	35	On or about November 17, 2022	Fraudulent transfer in the amount of \$317.23 in Town of Cusick STCU operating account funds D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
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14	36	On or about November 18, 2022	Fraudulent transfer in the amount of \$421.16 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account ACOMPLEX444 with account number ending in 2018.
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18	37	On or about November 30, 2022	Fraudulent transfer in the amount of \$309.00 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to PayPal account LMSERVAS with account number ending in 6878.
19			
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23	38	On or about December 3, 2022	Fraudulent transfer in the amount of \$314.15 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 t PayPal account LMSERVAS with account number ending in 6878.
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27	39	On or about December 4, 2022	Fraudulent transfer in the amount of \$442.77 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518
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		to PayPal account LMSERVAS with account number ending in 6878.
40	On or about December 5, 2022	Fraudulent transfer in the amount of \$600.00 in Town of Cusick STCU operating account funds using the Defendant's LUKE MICHAEL SERVAS' Town of Cusick credit card account number ending in 4906 to Defendant LUKE MICHAEL SERVAS' Uphold cryptocurrency account with user id ending in 5d8d.
41	On or about December 13, 2022	Fraudulent transfer in the amount of \$963.12 in Town of Cusick STCU operating account funds using the Defendant's LUKE MICHAEL SERVAS' Town of Cusick credit card account number ending in 4906 to Defendant LUKE MICHAEL SERVAS' Uphold cryptocurrency account with user id ending in 5d8d.
42	On or about December 15, 2022	Fraudulent transfer in the amount of \$487.02 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
43	On or about December 19, 2022	Fraudulent transfer in the amount of \$487.02 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
44	On or about January 1, 2023	Fraudulent transfer in the amount of \$483.93 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.

1	45	On or about January 7, 2023	Fraudulent transfer in the amount of \$483.93 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
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6	46	On or about January 20, 2023	Fraudulent transfer in the amount of \$489.08 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
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11	47	On or about February 2, 2023	Fraudulent transfer in the amount of \$468.50 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
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16	48	On or about February 11, 2023	Fraudulent transfer in the amount of \$483.93 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
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21	49	On or about February 20, 2023	Fraudulent transfer in the amount of \$494.22 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS' PayPal account LMSERVAS with account number ending in 6878.
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26	50	On or about February 27, 2023	Fraudulent transfer in the amount of \$494.22 in Town of Cusick STCU operating account funds using D.S.'s Town of Cusick STCU credit card account number ending in 4518 to Defendant LUKE MICHAEL SERVAS'
27			
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		PayPal account LMSERVAS with account number ending in 6878.
51	On or about March 20, 2023	Fraudulent check number 21306 made payable to Luke M Servas in the amount of \$4,961.08 dated March 10, 2023 and drawn upon the Town of Cusick's STCU account ending in 9869, bearing the forged and fraudulent signature of D.S. and E.A.

All in violation of 18 U.S.C. § 1344(1) and (2).

COUNTS 52 - 76

(Aggravated Identity Theft)

28. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 27 as if fully set forth herein. Further, the allegations in all other counts of the Indictment are re-alleged and incorporated into this count as if fully set forth herein.

29. On or about the dates set forth below, in the Eastern District of Washington, Defendant LUKE MICHAEL SERVAS did knowingly and without lawful authority, possess and use, without lawful authority, one or more means of identification of another person, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(5), knowing that the means of identification belonged to another actual person, in violation of 18 U.S.C. § 1028A(a)(1), described below for each count, each use constituting a separate count:

Count	Date	Description
52	October 6, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 1.
53	October 22, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 2.

54	November 2, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 3.
55	November 7, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 4.
56	November 7, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 5.
57	November 12, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 6.
58	November 13, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 7.
59	November 13, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 8.
60	November 16, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 9.
61	November 17, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 10.
62	November 18, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 11.
63	November 30, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 12.
64	December 3, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 13.
65	December 4, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 14.
66	December 15, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 17.

67	December 19, 2022	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 18.
68	January 1, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 19.
69	January 7, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 20.
70	January 20, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 21.
71	February 2, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 22.
72	February 11, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 23.
73	February 20, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 24.
74	February 27, 2023	Possession and use of D.S.'s Town of Cusick Credit Card during and in relation to the felony violation of 18 U.S.C. § 1343, as charged in Count 25.
75	March 20, 2023	Possession and use of D.S.'s signature during and in relation to the felony violation of 18 U.S.C. § 1344(1) and (2) as charged in Count 51
76	March 20, 2023	Possession and use of E.A.'s signature during and in relation to the felony violation of 18 U.S.C. § 1344(1) and (2) as charged in Count 51.

all in violation of 18 U.S.C. §1028A(a)(1).

NOTICE OF FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated herein by this reference for the purpose of alleging forfeitures.

Wire Fraud

1 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon
2 conviction of an offense(s) in violation of 18 U.S.C. § 1343, Wire Fraud, as set
3 forth in this Indictment, the Defendant, LUKE MICHAEL SERVAS, shall forfeit
4 to the United States any property, real or personal, which constitutes or is derived
5 from proceeds traceable to the offense(s). The property to be forfeited includes,
6 but is not limited to, the following:

7 MONEY JUDGMENT

8 A sum of money in United States currency, representing the amount
9 of proceeds obtained by the Defendant, from the wire fraud violations.

10 Bank Fraud

11 Pursuant to 18 U.S.C. § 982(a)(2)(A), upon conviction of an offense(s) in
12 violation of 18 U.S.C. § 1344, Bank Fraud, as set forth in this Indictment, the
13 Defendant, LUKE MICHAEL SERVAS, shall forfeit to the United States of
14 America, any property constituting, or derived from, proceeds obtained, directly or
15 indirectly, as a result of such violation(s). The property to be forfeited includes, but
16 is not limited to:

17 MONEY JUDGMENT

18 A sum of money in United States currency representing the amount
19 of proceeds obtained by the Defendant as a result of the bank fraud
20 violations.

21 Aggravated Identity Theft

22 Pursuant to 18 U.S.C. § 982(a)(2)(B) and/or 18 U.S.C. § 1028(b), upon
23 conviction of an aggravated identity theft offense(s) in violation of 18 U.S.C. §
24 1028A(a)(1), as set forth in this Indictment, the Defendant, LUKE MICHAEL
25 SERVAS, shall forfeit to the United States of America, any property constituting,
26 or derived from, proceeds obtained, directly or indirectly, as a result of such
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1 violation; and/or any personal property used or intended to be used to commit the
2 offense. The property to be forfeited includes, but is not limited to, the following:

3 MONEY JUDGMENT

4 A sum of money in United States currency representing the amount
5 of proceeds obtained by the Defendant as a result of the aggravated
6 identity theft violations.

7 If any of the property described above, as the result of any act or omission of
8 the Defendant:

- 9 a. cannot be located upon the exercise of due diligence;
10 b. has been transferred or sold to, or deposited with, a third party;
11 c. has been placed beyond the jurisdiction of the court;
12 d. has been substantially diminished in value; or
13 e. has been commingled with other property which cannot be divided
without difficulty,

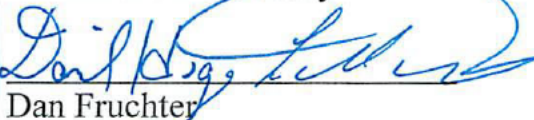
14 the United States shall be entitled to forfeiture of substitute property pursuant to 21
15 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
16 § 2461(c) (Wire Fraud); and/or as incorporated by 18 U.S.C. § 982(b)(1) and 28
17 U.S.C. § 2461(c) (Bank Fraud and Aggravated Identity Theft).

18
19 DATED this 19 day of March 2024

20 A TRUE BILL

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24
25 Vanessa R. Waldref
26 United States Attorney

27 

28 Dan Fruchter
Assistant United States Attorney